

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DANIEL JOYCE,  
Individually and on behalf of a class of others  
similarly situated,

Plaintiff,

v.

JOHN HANCOCK FINANCIAL SERVICES, INC.  
SEVERANCE PAY PLAN and JOHN HANCOCK  
FINANCIAL SERVICES, INC., as Administrator  
and Fiduciary of the John Hancock Financial  
Services, Inc. Severance Pay Plan,

Defendants

Civil Action No. 05-11428-WGY

**AFFIDAVIT OF ERIN N. JACKSON**

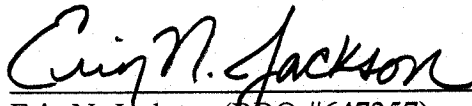
I, Erin N. Jackson, on my oath state as follows:

1. I am an attorney at the law firm of Goodwin Procter LLP, which represents the Defendants John Hancock Financial Services, Inc. Severance Pay Plan and John Hancock Financial Services, Inc. in the matter captioned above.
2. I submit this affidavit concerning the contents of the Supplemental Appendix in Support of Defendants' Motion for Summary Judgment ("Supplemental Appendix") on personal knowledge of the facts stated herein.
3. Exhibit 1 of the Supplemental Appendix is a true and accurate copy of the *Beacon Capital Partners Management, LLC Employee Handbook* that was produced to Defendants by Plaintiff Daniel Joyce in discovery in the matter captioned above.
4. Exhibit 2 of the Supplemental Appendix is a true and accurate copy of a letter from Peter Mongeau to Carlton Grant of 10/4/04, as well as the first two pages of the documents that were enclosed

with that letter. Each of these documents was produced to Plaintiff by Defendants in discovery in the matter captioned above.

5. The remaining materials contained in the Supplemental Appendix are true and accurate copies of excerpts from the transcripts of the depositions of Brian J. Bisciotti on May 9, 2006; William A. Bonn on May 16, 2006; Joan M. DiCicco on May 24, 2006; Thomas E. Moloney on June 20, 2006; and Peter J. Mongeau on May 22, 2006 in the matter captioned above.

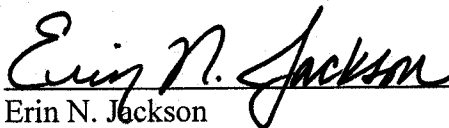
SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 14<sup>th</sup> DAY OF AUGUST, 2006.



Erin N. Jackson (BBO #647357)  
GOODWIN PROCTER LLP  
Exchange Place  
Boston, MA 02109-2881  
617.570.1000

**CERTIFICATE OF SERVICE**

I, Erin N. Jackson, hereby certify that on August 14, 2006 this AFFIDAVIT OF ERIN N. JACKSON was filed through the ECF system and will be served electronically on the registered participants, including Plaintiff's Counsel, as identified in the Notice of Electronic Filing. Paper copies will be sent to those indicated as non-registered participants on this date.



Erin N. Jackson  
GOODWIN PROCTER LLP  
Exchange Place  
Boston, MA 02109-2881  
617.570.1000